

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

V.

Case No. 3:12-CR-054-L

CYNTHIA STIGER (2)

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

TO THE HONORABLE MAGISTRATE JUDGE IRMA RAMIREZ:

Now comes Ms. Cynthia Stiger, Defendant, and files this motion to modify the conditions of pretrial release regarding Ms. Stiger and in support thereof shows:

1. Ms. Stiger is charged with 1 Count of Conspiracy to Commit Healthcare Fraud in Violation of 18 U.S.C. § 1349.
2. Ms. Stiger was admitted to pretrial release on February 28, 2012.
3. Among the conditions of pretrial release was the provision that Ms. Stiger not leave the State of Texas.
4. This provision is not workable or feasible under the circumstances, because Ms. Stiger has obtained employment in Texarkana, Texas selling mortuary services.
5. Texarkana borders on the State of Arkansas and travel through the city requires one to occasionally intrude from the State of Texas to the State of Arkansas. Such intrusion may be deemed a violation of the February 28, 2012 pretrial release order.
6. Therefore, Ms. Stiger requests that the conditions of pretrial release be modified to permit Ms. Stiger to enter into Texarkana, Arkansas as may be necessary for her employment.

WHEREFORE, PREMISES CONSIDERED, Ms. Stiger prays the conditions of

pretrial release be modified as requested hereinabove.

Respectfully submitted,

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JEFFREY C. GRASS
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Attorney for Cynthia Stiger

CERTIFICATE OF CONFERENCE

This is to certify that on March 16, 2012, Counsel for Defendant, Cynthia Stiger conferred with AUSA Michael Elliott about his opposition to this Motion to Modify Conditions of Pretrial Release, to which he has indicated that he is UNOPPOSED to this Motion.

s/ Jeffrey C. Grass
JEFFREY C. GRASS

CERTIFICATE OF SERVICE

This is to certify that on March 19, 2012, a true and correct copy of the above and foregoing document was served on all by ECF.

s/ Jeffrey C. Grass
JEFFREY C. GRASS